



Calorie Control Council

12-64368

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March 15, 1999

Mr. Joseph Levitt
Director
Center for Food Safety and Applied Nutrition
Food and Drug Administration
HFS-001
200 C Street
Washington, DC 20204

RE: Use of a Value of Not More Than 2 Calories per Gram for Soluble Dietary Fiber

Dear Mr. Levitt:

In February 1997, the Calorie Control Council submitted a Citizen Petition (Docket No. 97P-0056/CP1) to the Food and Drug Administration requesting that the Commissioner advise the food industry that it may use a caloric value of not more than 2 calories per gram for soluble fiber in food labeling, including Nutrition Facts labeling.

Specifically the petition requests that the Commissioner revise 21 CFR 101.9(c)(1)(i)(C) by providing for the use of a value of not more than 2 calories per gram for soluble dietary fiber. The revised section would read:

Using the general factors of 4, 4, and 9 calories per gram for protein; total carbohydrate less the amount of insoluble dietary fiber and half the amount of soluble fiber; and total fat, respectively, as described in the USDA Handbook No. 74 (slightly revised 1973) pp. 9-11, which is incorporated by reference in accordance with 5 U.S.C. 552(a) and 1 CFR part 51 (the availability of this incorporation by reference is given in paragraph (c)(1)(i)(A) of this section;

The Council's petition provided substantial documentation confirming that this value is more scientifically correct than the 4 calorie per gram value now required for soluble fiber. The Council also provided information on the benefits of dietary fiber. A reduced caloric value for soluble fiber would facilitate its further use in processed food products thereby providing additional fiber to the American diet.

97P-0056

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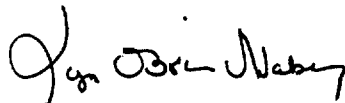
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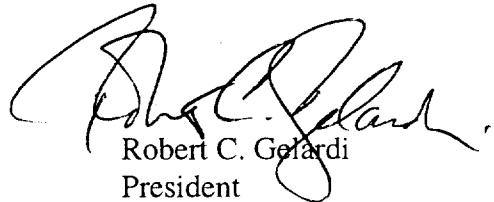
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The Council understands and appreciates the immensity of FDA's workload and limited resources. The Council would, therefore, appreciate confirmation that the Food and Drug Administration has no objection to the Calorie Control Council advising its members that a food factor of 2 may be used (in lieu of the factor of 4 currently applied) for soluble fiber unless a different factor is established for a particular soluble fiber ingredient and until such time that the FDA can complete its regulatory review of the Council's petition and amend 21 CFR 101.9(c)(1)(i)(C) as requested in the Council's petition.

Respectfully submitted,



Lyn O'Brien Nabors
Executive Vice President



Robert C. Gelardi
President

LONRCG/br